

In The United States District Court
For The Western District of Oklahoma

Bryan Wayne Davenport Plaintiff,	}	No. CIV-20-358-C
Us.		
Becky Pata, et al., Defendants.		

Subpoena to Produce Documents, Information, or
Objects Or to Permit Inspection of Premises in a Civil Action

To: Current Sheriff of Cleveland County, Chris Amason, and
Officials responsible for the operation of Cleveland County
Detention Center ("CCDC").

~~X~~ Production: You Are Commanded to produce at
the time, date, and place set forth below the following
documents, electronically stored information, or objects, and
permit inspection, copying, testing, or sampling of the material:

1. Please produce the contract between Cleveland County
Sheriff Office ("CCSO") and Turnkey in regards to providing

healthcare to inmates housed at CDC. Please produce all contracts between CDC and/or Turnkey and any off site healthcare providers.

2. Please provide any and all original grievances, request of staff ("ROS"), and medical request filed by Bryan Davenport, Inmate No. 2019001660, with all the original information, and in the original format, that was filed between June 28, 2019 through January 1, 2022.
3. Please produce any and all ROS, grievances, medical request, or other documents created by inmates or on behalf of inmates, concerning complaints of and/or the denial of medical care by Turnkey at CDC between January 1, 2017 through January 1, 2022.
4. Please produce any memoranda, logs, investigative files or other documents created in response to ("Request #2 and #3"), above.
5. State the names, titles, and duties of all staff members at CDC who had responsibility for responding to, investigating, or deciding inmate grievances between June 1, 2019 through January 1, 2022. If those duties are set forth in any job description, policy, testing, or instructions, produce the documents.

6. Please produce the grievance logs kept by CCDC between January 1, 2012 through January 1, 2022.
7. Please produce any and all grievance audits performed between January 1, 2012 through January 1, 2022, and the results and findings of those audits.
8. Please provide a list of "Special Care Inmates" seen at CCDC between January 2017 through January 2022, and when those inmate were added to that list.
9. Please produce all records and/or data that pertain to Bryan Davenport. This includes all inmate files, medical files, films, reports, recordings, video's, photographs, correspondence, notes, diaries and memorandums.
10. Please provide any and all bills, invoices, or other documents of whatever nature evidencing special or economic damages, charges or expenses that incurred while transporting, housing, providing medical care, and treatment for Bryan Davenport between June 1, 2019 through January 1, 2022.
11. State the duties of the Sheriff of Cleveland County, insofar

as they pertain to providing medical care, and transportation of inmates to medical appointments - to - off site ^{health} care providers. If these duties are set forth in any job description or other document, produce the document.

12. Please produce the CCSO custody manual that was in use between May 2018 through January 2022.
13. Please produce the Turn Key Health Health Services Policy and Procedures manual that was in use between May 2018 through January 2022.

Please produce the above documents, electronically stored information or objects to:

Bryan Davenport #664874
JCCC 5 South 103-B
216 North Murray Street
Helena, OK 73741

Date and Time: On or before September 1, 2022.

Please see Fed. R. Civ. 45(c), relating to the place of compliance;

Rule 45(d) relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: _____

Clerk of Court

Signature of Clerk or Deputy Clerk

Proceeding in forma pauperis, pursuant 28 USC § 1915(d),
Plaintiff seeks to have this subpoena served by the U.S.
Marshall Service or otherwise to:

1. Cleveland County Sheriff - Chris Amazon
Address: 2550 W. Franklin Rd., Norman, OK 73069
and/or
Mr Robert S. Lafferrandre & Ms. Jessica L. Dark
Pierce Couch Hendrickson Baysinger & Green, L.L.P.
1109 N. Francis Avenue OKC, OK 73126
Attorneys for CCDC Defendants

Certificate of Service

I hereby certify that on the 28th day of July 2022, I mailed the above, Fed.R. Civ.P. 45 Subpoena to the Clerk of the Western District of Oklahoma to be filed in the Court and served by the U.S. Marshals Service to Chris Amazon Sheriff of Cleveland County, and served to the Defendants below.

I also hereby certify that a true and correct copy of the above subpoena was mailed to the following, on the 28th day of July 2022

1. Mr. Robert S. Lafferrandre & Ms. Jessica L. Dark
Pierce Couch Hendrickson Baysinger & Green, L.L.P.
1109 N. Francis Avenue OKC, OK 73126
> > Attorneys for Defendants, <<
Lt. Mason Beem, Cpt. Brandi Garner, & Deputy Greg Wheatley
2. Ms. Alexandra G. An Loy
Turn Key Health Clinics, LLC
900 NW 12th Street OKC, OK 73106
> > Attorneys for Defendants <<
Becky Pata and Turn Key Health Clinics, LLC

Respectfully, Bryan Davenport #664874
Jccc 5-South-103B
216 Murray Street
Helena, OK 73741